

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Kareem Bellamy,

Plaintiff,

12-CV -1025 (AMD) (PK)

v.

**Notice of Cross Motion for
Partial Summary Judgment**

City of New York, John J. Gillen,
Michael F. Solomeno,
John Doe 1 and John Doe 2, Supervising
Officers at the NYPD 101st Precinct

Defendants.

Please take notice that, upon the annexed Declarations of Thomas Hoffman dated June 24, 2016, and the exhibits annexed thereto, and upon the accompanying Memorandum of Law, and upon all pleadings heretofore had herein, plaintiff by his attorney Thomas Hoffman, of Law Offices of Thomas Hoffman, P.C., shall move before this court pursuant to Rule 56 of the Federal Rules of Civil Procedure, on a date to be determined by the Court for an order for partial summary judgment declaring that the dismissal of Mr. Bellamy's indictment is a favorable termination as a matter of law; and/or for such other and further relief as this court deems just and equitable.

PLEASE TAKE FURTHER NOTICE that opposition papers, if any, shall be served pursuant to briefing schedule.

PLEASE TAKE FURTHER NOTICE that reply papers, if any, shall be served pursuant to briefing schedule.

Dated:

New York, New York
June 24, 2016

Respectfully submitted,

Law Offices of Thomas Hoffman, P.C.
Attorney for Plaintiff

By: : s/Thomas Hoffman
Thomas Hoffman
5 Columbus Circle @ 1790 Bdwy, 6th Flr.
New York, NY 10107
212 581 1180

To:
Matthew J. Modafferi, Esq.
Senior Counsel, Spec. Fed. Litigation Div.
Zachary W. Carter, Esq.
100 Church St.
New York, N.Y. 10007
212 356 2331
Attorney for Defendants City of New York,
John Gillen and Michael Solomeno

cc: Hon. Ann M. Donnelly (Hand Delivery and ECF)
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201